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District of Massachusetts

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U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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October 7, 2004

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**Re: United States v. Albert Innarelli, et al.**  
**CR-N-04-30046-MAP**

Dear Counsel:

This letter shall respond to your requests for automatic discovery under the Local Rules.

**A. Discovery Pursuant to Fed.R.Crim.Pro. 16(a)(1)(A) - (D)**

**1. Statements of the Defendant**

- a. IRS Memorandum of Interview of Albert Innarelli, dated 04/24/02 (1 page);
- b. IRS Memorandum of Interview of Albert Innarelli, dated 05/21/02 (4 pages);
- c. IRS Memorandum of Activity of Albert Innarelli, dated 05/21/02 (2 pages);
- d. IRS Memorandum of Interview of Albert Innarelli, dated 05/30/02 (2 pages);
- e. Grand Jury Testimony of Albert Innarelli, dated 06/06/02 (5 pages);
- f. IRS Memorandum of Interview of Michael Bergdoll, dated 01/17/03 (2 pages);
- g. IRS Memorandum of Interview of Michael Bergdoll, dated 02/13/03 (1 pages);
- h. IRS Memorandum of Interview of Michael Bergdoll, dated 03/12/03 (5 pages);
- i. IRS Arrest Report for Michael Bergdoll, dated 09/23/04 (2 pages);
- j. IRS Memorandum of Interview of Anthony Matos, dated 09/30/02 (1 pages);
- k. IRS Memorandum of Interview of Anthony Matos, dated 02/06/03 (1 page);
- l. Handwriting exemplars of Anthony Matos, dated 02/13/03 (9 pages);
- m. Grand Jury Testimony of Anthony Matos, dated 10/10/02 (5 pages);
- n. Grand Jury Testimony of Theodore Jarrett, dated 09/07/00 (13 pages);
- o. IRS Memorandum of Interview of Theodore Jarrett, dated 05/01/03 (3 pages);

- p. Grand Jury Testimony of Theodore Jarrett, dated 05/09/02 (52 pages);
- q. FBI 302 of Arthur Sotirion, dated 01/08/03 (1 page);
- r. Massachusetts State Police Report, dated 01/05/00, for Joseph Sullivan (1 page);
- s. Massachusetts State Police Report, dated 07/24/00, for Joseph Sullivan (1 page);
- t. Massachusetts State Police Report, dated 11/15/00, for Joseph Sullivan (1 page);
- u. Massachusetts State Police Report, dated 01/19/01, for Joseph Sullivan (1 page); and,
- v. IRS Memorandum of Interview of Joseph Sullivan, dated 10/02/02 (2 pages).

**2. Defendants' Prior Record**

NCIC printouts of all defendants enclosed.

**3. Documents and Tangible Objects**

The IRS is currently in possession of loan files, seized documents, documents, imaged computer hard drives, photographs and other tangible objects received pursuant to grand jury subpoena, search warrant, and/or consent search. Please schedule an appointment with this office to arrange for a review of these materials.

After a review of these materials, you may designate those documents that you wish to have copied. Copies may be obtained by making arrangements with a local copy center.

**4. Reports of Examinations and Tests**

None.

**B. Search Materials**

**1. Search Warrant Applications, Affidavits, and Returns**

1113 Main Street - Search No. 02m629

- a. Search warrant and inventory;
- b. Search warrant application and affidavit;

1113 Main Street - Search No. 02m633

- a. Search warrant and inventory;
- b. Search warrant application and affidavit;

10 Beechwood Drive - Search No. 03m607

- a. Search warrant and inventory;
- b. Search warrant application and affidavit;

494 Central - Search No. 04m620KPN

- a. Search warrant and inventory;
- b. Search warrant application and affidavit;

89 Hall Street - Search No. 04m621KPN

- a. Search warrant and inventory;
- b. Search warrant application and affidavit;

**2. Written Description of Consent Searches and Inventory**

None.

**C. Electronic Surveillance**

**1. Written Description of Any Intercept**

None.

**2. Statement Whether or Not the Government Intends to Offer Intercepts in its Case-in-Chief**

Not Applicable.

**3. Title III Applications, Affidavit, and Court Orders**

None.

**D. Consensual Intercepts**

**1. Written Description of Any Intercept**

This information will be supplied under separate cover.

**E. Known Unindicted Co-conspirators**

This information will be supplied under separate cover.

**F. Identifications**

**1. Written Statement Whether or Not Used for Any Witness**

None.

**2. Evidence Reflecting Identification Procedure**

None.


**G. Exculpatory Information, Promises, Rewards or Inducements**

This information will be supplied under separate cover.

Very truly yours,

MICHAEL J. SULLIVAN  
United States Attorney

By:

  
WILLIAM M. WELCH II  
Assistant United States Attorney

enc.

cc: Court clerk